

# EXHIBIT 1

Applicant / Second Defendant  
I.Khrapunov  
2<sup>nd</sup> Witness Statement  
25 May 2016

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
COMMERCIAL COURT

Claim No.: 2015 CL 549

BETWEEN:

JSC BTA BANK

Claimant

- and -

(1) MUKHTAR ABLYAZOV  
(2) ILYAS KHRAPUNOV

Defendants

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**SECOND WITNESS STATEMENT OF ILYAS KHRAPUNOV**

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I, ILYAS KHRAPUNOV of 295 Route D'Hermance, 1237 Anieres, Switzerland **WILL SAY** as follows:-

1. I make this statement to correct a mistake in my First Affidavit dated 30 November 2015.
2. I make this statement from matters within my own knowledge unless state otherwise. The facts and matters referred to in this statement are true to the best of my knowledge, information and belief. I make clear, for the avoidance of doubt, that nothing I say in this witness statement is intended to waive my legal professional privilege. Nor do I submit to the jurisdiction of the Court (my appeal against the finding that the Court has jurisdiction to hear this claim is pending).
3. At para 5(2) of my First Affidavit I stated that mine and my father's names were both added to the Interpol list of wanted persons in 2012. This was an error. My father's name was indeed added to that list in 2012, but mine was not added until April 2014, as explained at para 10 of Mr Jenkins's Fourth Statement. I apologise for this oversight.
4. For the avoidance of doubt, as regards my travel outside Switzerland, I have not travelled outside Switzerland since I became aware that there was an Interpol Red Notice registered against me in the summer of 2014 (as explained in para. 5 of my

witness statement dated 20 May 2016) nor have I done so since the Interpol Red Notice was issued in April 2014.

**STATEMENT OF TRUTH**

I believe that the facts stated in this witness statement are true.

Signed   
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ILYAS KHRAPUNOV

Dated 25 May 2016